

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

TO : RPR/RPI Coordinators **DATE:** February 23, 1998

THRU : Danny R. Lien, Manager
Responsible Party Remediation Section
Petroleum Storage Tank Division

FROM : Sherry Pierce, RPR Section, PST Division
Sean Kelly, Reimbursement Section, PST Division

SUBJECT : Preapproval Costs for Groundwater Monitoring of RNA Parameters

Three scenarios and associated costs have been developed which appear to fit most RNA monitoring situations. Four of six parameters of the basic suite of RNA parameters must be analyzed in the field due to their instability: dissolved oxygen (D.O.), pH, oxidation reduction potential (O.R.P. or redox) and ferrous iron (Fe II). The other two parameters, nitrate and sulfate, may be analyzed in the field or in the laboratory.

Scenario 1

If the proposal stipulates field analysis for the RNA suite of six parameters, then allowed costs are \$40 per well per event that RNA parameters are to be gathered. This cost is to be allowed in addition to the costs for groundwater monitoring. This cost is for additional field time for sampling and analyzing the RNA suite. Equipment and reagents that are a part of equipment operation are already included in the equipment truck item.

Scenario 2

If the proposal stipulates field analysis of the four "field parameters" and laboratory analysis of nitrate and sulfate, then allowed field costs are \$20 per well per event that RNA parameters are to be gathered. Analytical costs allowed for sulfate and nitrate per the reimbursable cost guidelines are \$24 each. Markup is allowed on analytical costs. **Please note:** If costs are preapproved for analysis of sulfate and nitrate in the laboratory and then the consultant decides to perform the analyses in the field, the Reimbursement Section will consider this to be a change in the scope of the workplan and cost proposal and the original preapproved cost for this item (RNA portion of monitoring) will be void. The Reimbursement Section will perform their application review based on the scope of work actually performed which, in this instance, would revert back to Scenario 1. The consultant may not shift costs for the laboratory analytical testing to additional personnel time.

Scenario 3

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If, due to site specific conditions, a coordinator feels that a more simplified suite of D.O., redox and pH, i.e. field parameters, will provide needed information, then allowed field costs are simply \$20 per well per event that the field parameters are to be gathered.

Regarding spreadsheets, there are currently two blank line items under the Equipment Costs section on the Groundwater Monitoring Preapproval Worksheet. Since the RNA monitoring costs are not equipment, they will not be subject to the 15% markup in the equipment section. However, one of these lines may be used to factor in the RNA monitoring personnel costs prior to spreadsheet modifications. The amount for RNA monitoring would not be included in the Subtotal Subcontracted Equipment; however, if it is a subcontracted personnel activity, a 10% markup is allowed as in Part A of the spreadsheet. The spreadsheet will be modified in the near future to include a new personnel line for RNA monitoring and a check box which will add cost for preparation of an OMPR for RNA CAP sites. In the case where RNA parameters are being added to monitoring for plume stability, no additional report costs are being allowed. They should be instructed to add the data to the existing data tables in the Annual Monitoring Report.

Please review the April 29, 1997 memo titled *Interim Guidance: Monitoring Natural Attenuation for Verification of Groundwater Plume Stability* for information on choosing wells to monitor for RNA parameters and analytical methods.

SAP/SMK/keh
rna.mem

cc: Mike Leckie, RPR Section, PST Division
Anton Rozsypal, Manager, RPI Section, PST Division